

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
In the Matter of the Common Carrier Bureau)	
Seeking Comments on the Petition of the)	NSD File No. L-01-87
Public Service Commission of South Carolina)	CC Docket 96-98
for Delegation of Authority to Implement)	CC Docket No. 99-200
Number Conservation Measures)	
_____)	

**COMMENTS OF PHILIP S. PORTER
CONSUMER ADVOCATE FOR THE STATE OF SOUTH CAROLINA**

Philip S. Porter, Consumer Advocate
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June 1, 2001

Philip S. Porter, Consumer Advocate for the State of South Carolina (“CA”) agrees that the Public Service Commission of South Carolina (“PSCSC”) should have delegated authority to implement mandatory pooling in South Carolina. In its March 31, 2000 *Number Resource Optimization First Report and Order* (“Order”), the Federal Communications Commission (“Commission”) stated that States can seek this authority.¹ The PSCSC has sought delegated authority to implement mandatory thousands-block pooling in the state of South Carolina. The PSCSC specifically requested thousands-block number pooling for the Charleston-North Charleston and the Columbia Metropolitan Statistical Areas (“MSAs”). In addition, the PSCSC requested authority to order sequential number assignment to minimize thousand-block contamination as well as authority to implement NXX code rationing procedures following area code relief to prevent a surge in demand for codes. Finally, in order to implement pooling conservation measures, the PSCSC requested authority to reclaim thousands-block numbers which are unused and which have a small percentage of contamination within a given thousand-block of numbers (Petition para.1).

The CA agrees that the NPAs in both the North Charleston – Charleston and the Columbia MSAs are in jeopardy. As stated by the PSCSC, Area Code relief for the 843 NPA, which was split from the current 803 NPA on March 22, 1998, is needed before another split is required. We agree with the PSCSC that, given the current rate of consumption, the current NPAs will exhaust the available numbers in less than two years. Pooling is essential; companies should no longer be allowed to obtain thousand-block

¹ Numbering Resource Optimization, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 7574 (2000).

numbers and not use them. No one wants to limit the reasonable use of numbers. The CA believes that with local authority, abuses will be curtailed. The CA also believes that pooling will conserve numbers and agrees that the PSCSC should be given the authority to implement this conservation plan. Consumers have already experienced significant disruption. Consumers should not have to experience additional area code changes and additions any sooner than necessary. If numbers are available, but not used, the PSCSC should require the release of these unused numbers. The PSCSC must be allowed to implement number pooling in order to direct our number resources to actual usage. The PSCSC is in the best position to determine the most efficient use of numbers in the entire State of South Carolina.

CONCLUSION

For the reasons set forth above, the CA urges the Commission to find that the PSCSC meets all the criteria established by the FCC and should be given the authority to implement number conservation measures in the State of South Carolina.

Respectfully submitted,

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